



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

May 5, 2004

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

2004 MAY 25 A 9:42

Sarah Brown, Treasurer  
Ohio State Republican Party  
211 S. Fifth Street  
Columbus, OH 43215

Response Due Date:  
June 4, 2004

Identification Number: C00162339

Reference: Amended December Monthly Report (11/01/03-11/30/03), received  
12/31/03

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

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To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

*Part 15* - Schedule A supporting Line 15 of the *Camera* Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from Mr. Robert T. Bennett, Mr. Phillip Bolte, Ed Pleasant for Council, Ms. Rita Graham, Ohio Federation of Republican Women, and US *data file* Postmaster-Columbus. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission. *data file - excess postage payment rent*

-Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Staff Health Insurance" and "Staff Life Insurance". Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal election activity or activities in connection with a Federal election

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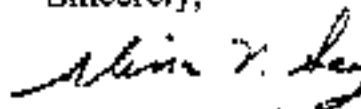
must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1153.

Sincerely,



Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division

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Contributor Name	Date	Amount
Cuyahoga County Republican Party	11/18/03	\$50.00
Franklin Co. Rep. Organization	11/13/03	\$5,000.00
Franklin County Forum	11/04/03	\$25.00
Paulding County Republican Com	11/07/03	\$5.00

Total \$5,100.00

Ohio Republican Party 000162339

Amended December Monthly Report (11/1/2003-11/30/2003)

Please be advised that I have received your letter dated May 5, 2004. Below is listed clarification that the FEC has requested.

1) Schedule A discloses contributions from a committee not registered with the FEC.

You sent a list of 4 committees. Only one of those committees meets the threshold requirement. We have talked with Franklin County Republican Party and they have asked us to reattribute their \$5000 contribution to our non-federal account. I will send a hard copy of the check for your records.

2) Schedule A supporting Line 15.

Reimbursement deposits were not previously allocated. The check from Robert T. Bennett was for camera equipment that had been given to the party at our last convention. Mr Bennett purchased it from the party. The reimbursements from Mr. Philip Bolle and Ed Pleasant for Council were for data files created by the Ohio Republican Party from our internal data files. We charge for requests of these data files. Ms. Rita Graham purchased stamps that we keep in petty cash. The Ohio Federation of Republican Women reimbursed us for office space rent and for payroll which is posted to ur reports under Line 21B. The US Postmaster refunded excess postage for a finance mailing we had done over a year ago. The postage would have been coded under Line 21B. Therefore all receipts posted to the report were posted correctly.

3) Schedule H4 supporting Line 21a regarding staff health and life insurance.

As of the time frame that this report covers only one staff member spent 25% of thier time on federal election activity. All other employees did not. These disbursements were for those other employees.

Should you have any further questions or concerns please do not hesitate to contact us.

Subj: FEC Electronic Filing Results  
Date: 5/19/2004 2:26:29 PM Eastern Daylight Time  
From: <http://db@sdrdc.com> (FEC Filing Server)  
To: [fmngwm@aol.com](mailto:fmngwm@aol.com)  
Sent from the Internet ([Details](#))

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 05/19/2004 - 14:26:30, and was assigned the Filing ID of: FEC-120354

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator                      Version 5.1.2.0

Developed for the Federal Election Commission  
by NIC Technologies, Inc. 1996-2004

=== Identification Section =====

Committee ID:        C00162339  
Committee Name:     Ohio State Central & Executive Committee  
Filing Type:        P99  
  
Software/Ver#:      FECfile / Ver# 5.1.2.0(f10)

=== Results Section =====

>>>---->    FEC data file PASSED validation!    <----<<<  
MD5 checksum:  
658fa3ab3d516fccf88da123c21b90d0



OHIO REPUBLICAN PARTY  
FEDERAL PROSPECTING ACCOUNT  
211 S. FIFTH STREET  
COLUMBUS, OHIO 43215  
A MULTICANDIDATE COMMITTEE

24038420573



THE FIFTH THIRD BANK OF COLUMBUS  
COLUMBUS, OHIO

BB-216/240

0001563

5/11/2004

PAY TO THE  
ORDER OF

STATE ACCOUNT ACCT#759-21007

\$ \*\*8,230.00

Six Thousand Two Hundred Thirty and 00/100\*\*\*\*\* DOLLARS

STATE ACCOUNT ACCT#759-21007

*Christine M. [Signature]*  
*[Signature]*

MEMO

⑈001563⑈ ⑈044002161⑈

751-27598⑈

OHIO REPUBLICAN PARTY-FEDERAL PROSPECTING ACCOUNT

STATE ACCOUNT ACCT#759-21007

5/11/2004

0001563

1010	State Acct (5th/3r	9-30-03	Scioto Cnty overcontribu	1,230.00
1010	State Acct (5th/3r	11-13-03	Franklin County overcon	5,000.00


*Is this reallocation*

Prospecting A

6,230.00

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 5-19-11
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER	5-25-11 DATE PREPARED

(5/2004)